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December 17, 1997

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OUR FILE NO.

25248.75266

VIA MESSENGER

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Secretary
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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: MM Docket No. 87-268,
In the Matter of Advanced Television Systems and
Their Impact Upon the Existing Television Broadcast Service

Dear Ms. Salas:

The School Board of Dade County, Florida (the "School Board"), by its undersigned legal counsel and pursuant to the Commission's *Public Notice* dated December 2, 1997 in the above-referenced proceeding, hereby comments on the *ex parte* submissions addressing digital television allotments filed by the Association for Maximum Service Television, Inc. and other broadcasters (collectively, "MSTV") on November 20, 1997 and by the Association of Local Television Stations ("ALTV") on November 25, 1997. The School Board supports the proposals of both MSTV and ALTV.

The School Board is the licensee of non-commercial, educational UHF television broadcast station WLRN-TV, NTSC Channel 17 in Miami, Florida. In the *Sixth Report and Order* in this proceeding, the Commission established a digital television ("DTV") Table of

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Allotments ^{1/} based upon the principle that a station's existing NTSC service area should be replicated to the maximum extent possible. With respect to WLRN-TV, the Commission's DTV Table reflected a "DTV/NTSC Area Match" of 100%. ^{2/}

In its November 20, 1997 *ex parte* filing, MSTV submits that the DTV Table of Allotments adopted in the *Sixth Report and Order* does not account for adjacent-channel DTV-to-DTV interference. According to MSTV, when such interference is taken into account, WLRN-TV's DTV service area in fact will replicate less than 55% of its NTSC service area. ^{3/} MSTV's proposed improvements to the DTV Table, on the other hand, reflect dramatic improvement of the replication of WLRN-TV's NTSC service area to 99.0%. ^{4/}

The School Board has not independently performed any studies to confirm the validity of the analysis that resulted in MSTV's proposed improvements to the DTV Table. Assuming, however, that the figures reported by MSTV are accurate, the School Board strongly supports MSTV's proposed improvements to the DTV Table. Replication of less than 55% of WLRN-TV's service area would significantly reduce the School Board's ability to serve its viewing area and is inconsistent with the goals of the DTV proceeding. The School Board therefore asks that the Commission strongly consider adopting MSTV's alternative DTV Table. ^{5/}

ALTV's *ex parte* filing addresses a second problem faced by WLRN-TV. While the Commission's DTV Table establishes a power level of only 103.4 kW for WLRN-TV, it establishes a substantially higher power level — a full 1000 kW — for non-commercial,

^{1/} *In the Matter of Advanced Television Systems and Their Impact Upon the Existing Television Broadcast Service*, MM Docket No. 87-268, *Sixth Report and Order*, FCC 97-115, released April 21, 1997, Appendix B.

^{2/} *Id.* at Table 1, p. B-14.

^{3/} *Ex Parte Submission Based on New Technical Discoveries to Help the Commission Improve the DTV Table of Allotments/Assignments*, Exhibit 1B, p. 10.

^{4/} *Id.*, Exhibit 1A, p. 10.

^{5/} The School Board agrees with MSTV that the Commission should encourage regional solutions to shared problems, and notes that the proposed improvements to the DTV Table would significantly increase the replication of at least two other stations in Miami: WCTD (replication increased from 36.9% to 98.6%); and WDZL (replication increased from 52.9% to 98.8%).


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educational VHF television broadcast station WPBT, NTSC Channel 2. In fact, the DTV Table reflects that WLRN-TV is one of the lowest powered full-service television station in the Miami market. The School Board therefore also supports ALTV's proposal, which would permit WLRN-TV to operate at increased power levels, without creating additional risk of interference (e.g., through the use of beam-tilted antennas).

Should there be any questions concerning this filing, please contact the School Board's undersigned counsel.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "E. Ashton Johnston", followed by a long horizontal line extending to the right.

E. Ashton Johnston
for PAUL, HASTINGS, JANOFSKY & WALKER LLP

cc: Chairman William E. Kennard
Commissioner Susan Ness
Commissioner Harold Furchgott-Roth
Commissioner Michael Powell
Commissioner Gloria Tristani
Richard M. Smith, Chief, Office of Engineering and Technology
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